

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

WASHINGTON RESEARCH
FOUNDATION,

Plaintiff and Defendant
in Intervention,

v.

MATSUSHITA ELECTRIC
INDUSTRIAL COMPANY, LTD.;
PANASONIC CORP. OF NORTH
AMERICA; SAMSUNG
ELECTRONICS COMPANY, LTD;
SAMSUNG ELECTRONICS
AMERICA, INC.; NOKIA CORP.;
NOKIA INC.; APPLE INC.; DELL INC.;
LOGITECH INTERNATIONAL S.A.;
LOGITECH INC.; MOTOROLA, INC.;
PLANTRONICS, INC.; SONY CORP.;
SONY CORP. OF AMERICA; SONY
ERICSSON MOBILE
COMMUNICATIONS AB; SONY
ERICSSON MOBILE
COMMUNICATIONS (USA) INC.;
TOSHIBA CORP.; TOSHIBA
AMERICA, INC.; WAFERTECH, LLC,

Defendants,

and

CSR plc,

Plaintiff in Intervention.

No. 2:06-cv-01813-TSZ

STIPULATION AND [PROPOSED]
ORDER OF DISMISSAL

NOTE ON MOTION CALENDAR:
April 30, 2007

I. STIPULATION

WHEREAS, Washington Research Foundation (“WRF”) and CSR plc (“CSR”) have agreed to settle all claims relating to CSR’s allegations that U.S. Patent 7,116,963 (“the ‘963 Patent”) is invalid and that CSR does not infringe the ‘963 Patent, and WRF’s claims that CSR infringes the ‘963 Patent and U.S. Patent 6,631,256 (“the ‘256 Patent”) and WRF’s claims that defendants Matsushita Electric Industrial Company, Limited, Panasonic Corporation Of North America, Samsung Electronics Company, Limited, Samsung Electronics America, Incorporated, Nokia Corporation, Nokia Incorporated, Apple Inc., Dell Inc., Logitech International S.A., Logitech Inc., Motorola, Inc., Plantronics, Inc., Sony Corporation, Sony Corporation Of America, Sony Ericsson Mobile Communications AB, Sony Ericsson Mobile Communications (USA) Inc., Toshiba Corporation, Toshiba America, Inc., and Wafertech, LLC (collectively, the “Defendants”) infringe the ‘963 patent and the ‘256 Patent by their manufacture, use, sale, offer for sale, or importation into the United States of CSR’s products;

WHEREAS, CSR and WRF have entered into a Settlement and Licensing Agreement, which became effective within three days prior to the filing date of this Stipulation;

NOW THEREFORE, in accordance with Federal Rule of Civil Procedure 41, CSR and WRF hereby stipulate, by and through their respective undersigned counsel of record, to the following:

1. In accordance with the terms of the Settlement and Licensing Agreement, all of WRF’s claims against CSR in the present action are hereby dismissed with prejudice.
2. All of CSR’s claims against WRF in the present action are hereby dismissed with prejudice.
3. All of WRF’s claims against each Defendant to this action are dismissed with prejudice as to CSR’s products to the extent any alleged infringement is premised on

the presence, inclusion or use of a CSR product, and without prejudice as to any other claims against such Defendants.

4. WRF and CSR shall each bear its own fees and costs in connection with this action.

Dated: April 30, 2007

BLANK LAW & TECHNOLOGY P.S.

By: /s/ C. Dean Little

C. Dean Little

Jonathan Yeh

2001 Western Avenue Suite 250

Seattle, Washington 98121

Phone: 206.256.9699

Fax: 206.256.9899

VICTORIA GRUVER CURTIN, P.L.C.

Victoria Gruver Curtin

14555 North Scottsdale Rd, Ste. 160

Scottsdale, Arizona 85254

Phone: 480.998.3547

Fax: 480.596.7956

LAW OFFICES OF STEVEN G. LISA, LTD.

Steven G. Lisa

55 West Monroe Street, Suite 3200

Chicago, Illinois 60603

Phone & Fax: 312.752.4357

Gerald D. Hosier

8904 Canyon Springs Drive

Las Vegas, NV 89117

Phone: 702.256.8904

Fax: 702.256.8967

Attorneys for Plaintiff WRF

Respectfully submitted,

YARMUTH WILSDON CALFO PLLC

By: /s/ Scott T. Wilsdon

Scott T. Wilsdon, WSBA No. 20608

Jeremy E. Roller, WSBA No. 32021

925 Fourth Avenue, Suite 2500

Seattle, WA 98104

Phone: 206.516.3800

Fax: 206.516.3888

Email: wilsdon@yarmuth.com

jroller@yarmuth.com

FISH & RICHARDSON P.C.

By: /s/ Ruffin B. Cordell

Ruffin B. Cordell (*pro hac vice*)

Jennifer Towle (*pro hac vice*)

1425 K St. NW, 11th Floor

Washington, DC 20005

Phone: 202.783.5070

Fax: 202.783.2331

Email: cordell@fr.com

towle@fr.com

Gilbert Hennessey (*pro hac vice*)

Jeffery Barclay (*pro hac vice*)

225 Franklin St.

Boston, MA 02110

Phone: 617.542.5070

Fax: 617.542.8906

Email: hennessey@fr.com

barclay@fr.com

Attorneys for Plaintiff in Intervention CSR plc

II. ORDER

IT IS SO ORDERED.

Dated this _____ day of _____, 2007.

The Honorable Thomas S. Zilly
United States District Judge

Presented by,

YARMUTH WILSDON CALFO PLLC

FISH & RICHARDSON P.C.

By: /s/ Scott T. Wilsdon

Scott T. Wilsdon, WSBA No. 20608
Jeremy E. Roller, WSBA No. 32021
925 Fourth Avenue, Suite 2500
Seattle, WA 98104
Phone: 206.516.3800
Fax: 206.516.3888
Email: wilsdon@yarmuth.com
jroller@yarmuth.com

By: /s/ Ruffin B. Cordell

Ruffin B. Cordell (*pro hac vice*)
Jennifer Towle (*pro hac vice*)
1425 K St. NW, 11th Floor
Washington, DC 20005
Phone: 202.783.5070
Fax: 202.783.2331
Email: cordell@fr.com
towle@fr.com

Attorneys for Plaintiff in Intervention CSR
plc

Gilbert Hennessey (*pro hac vice*)
Jeffery Barclay (*pro hac vice*)
225 Franklin St.
Boston, MA 02110
Phone: 617.542.5070
Fax: 617.542.8906
Email: hennessey@fr.com
barclay@fr.com

Attorneys for Plaintiff in Intervention CSR
plc